Exhibit G

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13	Attorneys for Defendant		
14	GOOGLE INC. UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION		
16			
17	BAITTANOL	SEC BIVISION	
18			
19	ORACLE AMERICA, INC.,	Case No. 3:10-cv-03561-WHA	
20	Plaintiff,	DECLARATION OF MATT CUTTS IN	
21	v.	RESPONSE TO DECLARATION OF	
	GOOGLE INC.,	FRED NORTON	
22	Defendant.	Judge: Hon. Donna M. Ryu	
23		Date Comp. Filed: October 27, 2010	
24		Trial Date: October 31, 2011	
25		·	
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	DECLARATION OF MATT CUTTS IN RESPO	NSE TO DECLARATION OF FRED NORTON	

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I, Matt Cutts, state:

- I am employed by Defendant Google Inc. ("Google") as a Software Engineer. I submit this declaration to provide factual background regarding Google's search process and display. This declaration responds to the Declaration of Fred Norton in support of Oracle's motion to compel production of the August 6, 2010 email of Tim Lindholm and drafts thereof.
- 2. I have knowledge of the facts set forth herein, and if called to testify as a witness thereto could do so competently under oath.
- 3. The Norton Declaration states that "Google itself continues to make the contents of the Lindholm Document widely available." Norton Decl. ¶ 47. As support for this assertion, the Declaration describes and includes as exhibits the purported results of a Google search query for language quoted from the "Lindholm Document." Norton Decl. ¶ 47 & Exs. O-P.
- 4. Google's search engine "crawls" the web, indexes websites, and identifies matches in response to user queries. Google then extracts excerpts from those web pages and presents the excerpts on the user's computer screen to describe the search results.
- 5. Google's automated search process merely pulls from its database and presents to the user information about web pages created by third parties that contain the search terms chosen by the user. Google cannot and does not control the content of third-party web pages. Google tries to return relevant web pages as determined by an algorithm, but cannot make any promises as to the truthfulness or accuracy of the information.
- 6. Google blocks web pages from appearing in its results under very limited circumstances, such as: the content is gone from the web, the website's owner indicates that the content should not be indexed, the content poses risk to security (such as disclosure of highly sensitive personal information like credit card numbers), the webmaster is violating our Webmaster Guidelines or "spamming" our search results, or we are notified that the content violates applicable law (such as via a court order or a notification under the Digital Millennium Copyright Act). As described in the Norton Declaration, none of the third-party web pages referencing the Lindholm email fall into any of these categories.

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1	7. Thus, it is inaccurate for Mr. Norton to assert that "Google itself make[s]
2	available" the contents of the Lindholm email.
3	
4	I declare under penalty of perjury that the foregoing facts are true and correct and that
5	this declaration was executed at Mountain View, California on August 18, 2011.
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7	Br. M. acto
8	By: Matt Cutts
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